

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LORI GJENASHAJ AND
QAMIL GJENASHAJ

Plaintiffs

vs.

THE CITY OF NEW YORK, LIEUTENANT MATTHEW HARRISON individually and in his official capacity, POLICE OFFICER GIANCARLO MARATEA individually and in his official capacity, POLICE OFFICER RAYCHEL CAMPANELLA-RIVERA individually and in her official capacity, POLICE OFFICER VANESA MEDINA individually and in her official capacity, POLICE OFFICER BRUNILA SANTANA and individually and in her official capacity, and POLICE OFFICER THOMAS GUGLIUCCI, individually and in his official capacity, employees of The City of New York.

Defendants

**STIPULATION AND ORDER OF
VOLUNTARY PARTIAL
DISMISSAL**

Civil Action No. 19-CV-04142

WHEREAS, Plaintiffs commenced this action by filing a Complaint on or about May 8, 2019, an Amended Complaint on September 26, 2019, and a Second Amended Complaint on January 3, 2020, alleging that Defendants violated Plaintiffs' federal civil rights; and

WHEREAS, Plaintiffs now seek to voluntarily dismiss any and all claims against Police Officer Brunila Santana without prejudice as her only involvement in the incident that is the subject of this lawsuit was in the arrest of Plaintiff Qamil Gjenashaj;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, as follows:

1. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, any and all federal and state law claims and rights of action arising out of the facts and circumstances that are the subject of this action, and that were asserted or could have been asserted by or on behalf of

either Plaintiffs against Defendant Police Officer Brunila Santana, her successors and assigns, are hereby dismissed and discontinued, without prejudice, and without attorney's fees, costs or disbursements to any party.

2. This Stipulation contains all the terms and conditions agreed upon by counsel for Defendants and counsel for Plaintiffs hereto, and no oral agreement entered into at any time nor any written agreement entered into prior to the execution of this Stipulation shall be deemed to exist, or to bind the parties hereto, or to vary the terms and conditions contained herein.

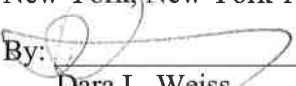
3. This Stipulation shall be binding upon the parties immediately upon signature and shall be submitted to the Court for entry as an Order.

Dated: New York, New York
January 21, 2020

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By: /s/ Joseph Stone
Joseph I. Stone
Attorney for Plaintiffs

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By: 
Dara L. Weiss
Senior Counsel
Special Federal Litigation

SO ORDERED:

HON. WILLIAM H. PAULEY, III
UNITED STATES DISTRICT JUDGE

Dated: _____, 2020